

A Professional Corporation
MARTINEZ & RITORTO
 Attorneys at Law

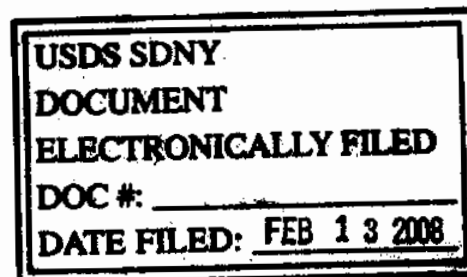
67 Wall Street
 New York, New York 10005

Tel. 212-248-0800
 Fax. 212-248-0990

February 12, 2008

Via E-mail (CrottyNYSDChambers@nysd.uscourts.gov)

Hon. Paul A. Crotty
 United States District Courthouse – SDNY
 500 Pearl Street, Room 735
 New York, NY 10007-1312



Re: Acosta v. American Sales & Management Organization Corporation et al
SDNY Case No. 07-6326 (PAC)(FM)
 Our File: 2032-31

Dear Judge Crotty:

We represent Defendant American Sales & Management Organization Corporation (hereinafter "ASMORG") in the above-captioned action, and write on behalf of all Parties. As explained during the status conference held before Your Honor on February 7, 2008, the discovery process has been delayed due to difficulties in obtaining Plaintiff's medical records, many of which are located in Puerto Rico. Due to such delays, and due to the fact that ASMORG's counsel will be out of the jurisdiction on trial from mid-February to mid-March, Your Honor granted a 90-day extension on all discovery dates and deadlines. Accordingly, Your Honor instructed the Parties to submit a revised Civil Case Management Plan incorporating the 90-day extension. The revised Civil Case Management Plan, which has been agreed upon by all Parties, is as follows:

Civil Case Management Plan	Current Deadline	Requested Extension
✕ Discovery - depositions to be completed no later than:	March 3, 2008	✕ June 6, 2008
✕ Motion to Amend or to join additional parties to be filed no later than:	March 4, 2008	✕ June 9, 2008
✕ Parties to meet to confer on scheduled for expert disclosures no later than:	March 5, 2008	✕ June 10, 2008
✕ All fact discovery to be completed no later than:	April 4, 2008	✕ July 7, 2008
✕ Date recommended by counsel for alternate dispute resolution:	April 4, 2008	✕ July 7, 2008
✕ All counsel to meet face-to-face to discuss settlement no later than:	April 18, 2008	✕ July 18, 2008
✕ All expert discovery to be completed no later than:	May 20, 2008	✕ August 20, 2008

MEMO ENDORSED

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Hon. Paul A. Crotty
February 12, 2008

Page 2

We have attached the previous Order setting forth the current discovery schedule for the Court's ease of reference.

Thank you for your consideration.

Respectfully submitted,

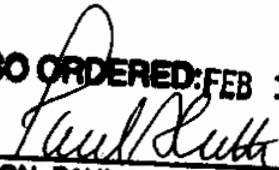
/s/ Louis R. Martinez

Louis R. Martinez (LM 9155)

LRM/saf
Enclosure

cc: All counsel via e-mail

*Application GRANTED. The next Pretrial Conference will
take place on 4/24/08 at 2:15 PM in Courtroom 20-C

SO ORDERED: FEB 13 2008

HON. PAULA A. CROTTY
UNITED STATES DISTRICT JUDGE